

DENNIS M. PRINCE  
Nevada Bar No. 5092  
KEVIN T. STRONG  
Nevada Bar No. 12107  
**PRINCE LAW GROUP**  
10801 W. Charleston Boulevard  
Suite 560  
Las Vegas, Nevada 89135  
Tel: (702) 534-7600  
Fax: (702) 534-7601  
Email: [eservice@thedplg.com](mailto:eservice@thedplg.com)  
Attorneys for Plaintiff  
*Debbie Siegfried*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

DEBBIE SIEGFRIED, individually,  
Plaintiff,  
vs.  
LOYA INSURANCE COMPANY, a  
Foreign Corporation; and JESS LOPEZ,  
individually; DOES I through X; and ROE  
BUSINESS ENTITIES I through X,  
inclusive,  
Defendants.

CASE NO.: 2:20-cv-01905-KJD-DJA  
**ORDER GRANTING**  
**JOINT MOTION TO CONTINUE**  
**HEARING ON PLAINTIFF'S**  
**MOTION TO COMPEL (ECF No. 50)**  
**AND DEFENDANT LOYA**  
**INSURANCE COMPANY'S**  
**MOTION FOR PROTECTIVE**  
**ORDER (ECF No. 51)**

Plaintiff DEBBIE SIEGFRIED ("Siegfried"), by and through her counsel of record, Dennis M. Prince and Kevin T. Strong of PRINCE LAW GROUP, and Defendant LOYA INSURANCE COMPANY ("Loya"), by and through its counsel of record, M. Bradley Johnson of KRAVITZ SCHNITZER JOHNSON & WATSON, CHTD., hereby file their *Joint Motion to Continue Hearing on Plaintiff's Motion to Compel (ECF No. 50) and Defendant Loya Insurance Company's Motion for Protective Order (ECF No. 51)*.

**MEMORANDUM OF POINTS AND AUTHORITIES**

**I.**

**LEGAL ARGUMENT**

"[D]istrict courts . . . retain broad discretion to control their dockets . . . ." *Shahrokhi v. Harter*, No. 2:21-cv-01126-RFB-NJK, 2021 U.S. Dist. LEXIS 247936, at \*4



(D. Nev. Dec. 30, 2021). On February 13, 2023, this Court scheduled a hearing on Siegfried's Motion to Compel Defendant Loya Insurance Company's Responses to Plaintiff's Third Set of Requests for Production of Documents and Fourth Set of Requests for Production of Documents (ECF No. 50) and Defendant Loya Insurance Company's Motion for Protective Order Regarding Plaintiff Debbie Siegfried's Deposition Subpoena to the F.R.C.P. 30(b)(6) Representative for Loya Insurance Company (ECF No. 51) for Thursday, March 2, 2023 at 10:00 a.m. Siegfried and Loya hereby respectfully request this Court to continue the March 2, 2023 hearing to March 9, 2023 or any date thereafter that may be more convenient for this Court.<sup>1</sup> The parties request this continuation because counsel for Siegfried are scheduled to attend a full-day mediation in an unrelated matter that was scheduled prior to this Court's Order setting the hearing.

## II.

### CONCLUSION

Based on the foregoing, the parties respectfully request this Court to grant their motion and continue the March 2, 2023 hearing to March 9, 2023 or any date thereafter that is more convenient for this Court.

DATED this 24th day of February, 2023.

DATED this 24th day of February, 2023.

**PRINCE LAW GROUP**

**KRAVITZ, SCHNITZER JOHNSON &  
WATSON, CHTD.**

/s/ Kevin T. Strong  
DENNIS M. PRINCE  
Nevada Bar No. 5092  
KEVIN T. STRONG  
Nevada Bar No. 12107  
10801 W. Charleston Boulevard  
Suite 560  
Las Vegas, Nevada 89135  
Tel: (702) 534-7600  
Fax: (702) 534-7601  
Attorneys for Plaintiff  
*Debbie Siegfried*

/s/ M. Bradley Johnson  
M. BRADLEY JOHNSON  
Nevada Bar No. 4646  
8985 S. Eastern Avenue  
Suite 200  
Las Vegas, Nevada 89123  
Tel: (702) 322-4126  
Fax: (702) 362-2203  
Attorneys for Defendant  
*Loya Insurance Company*

<sup>1</sup> Siegfried and Loya hereby file this joint motion in lieu of a stipulation because Defendant Jess Lopez is a Defendant in this action who has not filed an answer or otherwise made an appearance. See LR 7-1(c) ("A stipulation that has been signed by fewer than all the parties or their attorneys will be treated—and must be filed—as a joint motion).

**CERTIFICATE OF SERVICE**

Pursuant to LR 5-1 and FRCP 5(b), I hereby certify that I am an employee of **PRINCE LAW GROUP** and that on the 24th day of February, 2023, I electronically filed the foregoing document entitled **JOINT MOTION TO CONTINUE HEARING ON PLAINTIFF'S MOTION TO COMPEL (ECF No. 50) AND DEFENDANT LOYA INSURANCE COMPANY'S MOTION FOR PROTECTIVE ORDER (ECF No. 51)** with the Clerk of the Court using the CM/ECF system, which sent a notice of electronic filing to the following:

M. Bradley Johnson  
Kristopher T. Zeppenfeld  
**KRAVITZ, SCHNITZER & JOHNSON**  
8985 S. Eastern Avenue, Suite 200  
Las Vegas, Nevada 89123  
Tel: (702) 322-4126  
Fax: (702) 362-2203  
Attorneys for Defendant  
*Loya Insurance Company*

Pursuant to LR 5-1 and FRCP 5(b), I hereby certify that I also served the foregoing documents via First-Class United States Mail to the following address:

Jess Lopez  
8744 Raindrop Canyon  
Las Vegas, Nevada 89129

/s/ Kevin T. Strong  
An Employee of Prince Law Group

**ORDER**

Having reviewed the parties' joint motion [ECF No. 69], the Court finds good cause to grant it. Accordingly, IT IS HEREBY ORDERED that the motions hearing scheduled for March 2, 2023 is **VACATED** and **RESET** to **Monday, March 20, 2023 at 10:00 a.m. in Courtroom 3A.**

DATED this 27th day of February, 2023.



DANIEL J. ALBRECHTS  
UNITED STATES MAGISTRATE JUDGE